

C. BENJAMIN SCROGGINS (Bar No. 7902)
Law Firm of C. Benjamin Scroggins, Chtd.
629 S. Casino Center Boulevard, Ste. 5
Las Vegas, NV 89101
(702) 328-5550 (phone)
(702) 442-8660 (fax)
Email: info@cbscrogginslaw.com

Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARLAND JACKSON, MOTHER (Wilma Banks),

Plaintiff,

v.

STATE OF NEVADA, DOC, *et al.*,

Defendants.

Case No. 2:23-cv-02015-CDS-BNW

**STIPULATION AND PROPOSED
ORDER TO AMEND COMPLAINT
(FIRST REQUEST)**

Plaintiff, Marland Jackson, Mother (Wilma Banks) ("Plaintiff"), through her attorney, C. Benjamin Scroggins, Esq. of Law Firm of C. Benjamin Scroggins, and Interested Party Nevada Department of Corrections, through their attorneys of record, Aaron D. Ford, Esq., and Victoria C. Corey, Deputy Attorney General, of the Office of the Attorney General, respectfully submit the following Stipulation to Amend Complaint and establishment of the deadlines to file a notice of acceptance of service and responsive pleading as follows:

1. Plaintiff may file an Amended **Complaint no later than sixty (60) days from the date of the Court's order approving this stipulation;**

2. **Within twenty-one (21) days of the filing of the Amended Complaint,** the OAG shall file a notice of acceptance of service of process on behalf of those Defendants named in the Amended Complaint from whom OAG has received requests for representation;

3. As to any of the named defendants for whom the OAG cannot accept service, the OAG shall file under seal, with service to Plaintiff's counsel, the last known address(es)

of those defendant(s) for whom it has such information. **Any such disclosure is for attorney's eyes only;**

4. If service cannot be accepted for any of the named defendant(s), service must be attempted as under FRCP 4; and

5. Any defendant for whom the OAG accepts service of process shall file and serve a responsive pleading to the Amended Complaint **within sixty (60) days of the filing of the Amended Complaint.**

By entering into this stipulation, none of the parties waive any rights or defenses they have under statute, law, or rule with respect to Plaintiff's complaint.


DATED this 4th day of March, 2024. DATED this 4th day of March, 2024.

AARON D. FORD
Attorney General

By: <u>/s/ C. Benjamin Scroggins</u>	By: <u>/s/ Victoria C. Corey</u>
C. BENJAMIN SCROGGINS (Bar No. 7902)	VICTORA C. COREY (Bar No. 16364)
<i>Attorney for Plaintiff</i>	Deputy Attorney General
	<i>Attorneys for Interested Party</i>

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATE: 3/7/2024